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Attorneys for Minh and Gurdon Merchant

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

Bankruptcy Case
Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE
BY MINH AND GURDON
MERCHANT**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

* All papers shall be filed in the Lead Case,
No. 19-30088 (DM).

1 **PLEASE TAKE NOTICE** that Minh and Gurdon Merchant (“the Merchants”) hereby
2 requests, pursuant to Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy
3 Procedure, or pursuant to any other applicable rule or statute, that notice of all matters which may
4 come before the Court be given to the Merchants’ counsel of record:

5 GROSS & KLEIN LLP
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13 The foregoing request includes, without limitation all notices, papers, and disclosure
14 statements referred to in Rules 2002, 3017, and 9007 of the Federal Rules of Bankruptcy
15 Procedure, and also includes notice of any orders, applications, complaints, demands, hearings,
16 motions, petitions, pleadings or requests, and any other documents brought before the Court in
17 this case, as well as anything concerning which the Merchants may be heard under Section 1109
18 of the Bankruptcy Code, whether formal or informal, whether written or oral, and whether
19 transmitted or conveyed by electronic mail, mail, hand delivery, telephone, telegraph, facsimile,
20 or otherwise.

21 This notice of appearance and request for special notice, as well as any subsequent
22 appearance, pleading, claim or suit, are without prejudice to and do not waive and expressly
23 reserves: (1) the Merchants’ rights, remedies, claims, actions, defenses, setoffs, or recoupments,
24 in law or in equity, against the above-captioned debtor and any other person either in this case or
25 in any other action; (2) any objection which may be made to the jurisdiction of the Court; (3) the
26 Merchants’ right to have final orders in non-core matters entered only after de novo review by a
27 district judge; (4) the Merchants’ right to trial by jury in any proceedings or trial, in any state or
28 federal court, so triable herein or in any case, controversy or proceeding relating hereto; and (5)
the Merchants’ right to have and reference withdrawn in any matter subject to mandatory or
discretionary withdrawal. This notice of appearance and request for special notice, as well as any
subsequent appearance, pleading, claim or suit, are not, shall not be deemed or construed as, a

NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE; Case Nos. 19-30088, 19-30089

1 submission of the Merchants to the jurisdiction of the Court concerning any claim or the waiver
2 of any rights of the Merchants to pursue any claims against any person in any other forum, state
3 or federal, including without limitation, the jurisdiction of the Court to adjudicate non-core
4 matters, all of which rights are reserved without prejudice.

5
6 Dated: February 20, 2019

GROSS & KLEIN LLP

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8 By: /s/ Stuart G. Gross

STUART G. GROSS

9 *Attorneys for Minh and Gurdon Merchant*
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